

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

LINDA MCMAHON, *et al.*,

Defendants.

Civil Action No. 25-10601-MJJ

SOMERVILLE PUBLIC SCHOOLS, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Civil Action No. 25-10677-MJJ

DECLARATION OF RACHEL OGLESBY

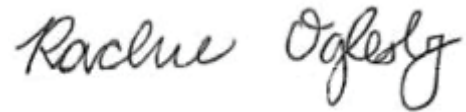
1. My name is Rachel Oglesby. I make this Declaration based on my own personal knowledge, on information contained in the records of the Department of Education, or on information provided to me by Department of Education employees.
2. I am currently employed as Chief of Staff for the U.S. Department of Education, headquartered in Washington, D.C. I began my service at the Department on January 20, 2025.

3. Before joining the Department, I worked at America First Policy Institute as the Chief State Action Officer and Director of the Center for the American Worker.
4. In my role at the Department, I have the following responsibilities:
 - a. I assist the Secretary of Education with all her responsibilities running the Department.
 - b. I advise the Secretary on significant matters within and affecting the Department.
5. I submitted declarations in this matter on June 3, 2025, June 10, 2025, June 17, 2025, June 26, 2025, and July 1, 2025, describing the Department's compliance activities with regard to the preliminary injunction issued by this Court on May 22, 2025 (the "Preliminary Injunction"), and I incorporate herein by reference the statements made in my previous declarations. I am also aware of the preliminary injunction issued by this Court on June 18, 2025 in *Victim's Rights Law Center v. U.S. Department of Education*, Case No. 25-11042-MJJ specific to the Department's Office for Civil Rights (the "OCR Order"). This declaration specifies Department compliance actions with respect to the Preliminary Injunction and the OCR Order.
6. Due to the July 4th holiday, the ad hoc committee described in my earlier declarations met again on July 7, 2025, to further coordinate reintegration activities. By July 8, 2025, the Department had:
 - Confirmed that a total of 527 responses were received by July 7, to the Department's "Outside Employment Survey" from employees who had received RIF notices on March 11, 2025.
 - For those employees who responded to the survey and indicated that they have obtained outside employment since receiving notification of the RIF, and that they plan to remain in their new position following reintegration, the Department continues to review those responses to ensure compliance with applicable ethics rules.
 - For employees who have not responded despite multiple requests (and recognizing this is a voluntary survey), the Department is discussing whether to engage in individual outreach or to assume non-responses indicate no outside employment.
 - Confirmed that a total of 1,033 responses were received by July 7, to the Department's "Employee Reintegration and Space Planning Survey" from employees who had received RIF notices on March 11, 2025.
 - For employees who have not responded despite multiple requests (and recognizing this is a voluntary survey), the Department is discussing whether to engage in individual outreach to obtain information or in the absence of an employee response how to act on the best information available to the Department.

- Continued to build-out the Department's reintegration plan to ensure all dependencies and supporting actions are identified, including reconciling employee responses (and non-responses) to the two surveys and integrating into the reintegration plan the data provided in those responses.
 - Continued the process of IT restoration as to government furnished equipment (GFE) previously returned by employees that must be reimaged and updated to Windows 11, in preparation for reissuing GFE to employees, a process proceeding at a rate of approximately 50 GFE units per week.
 - Continued planning for physical space and remote (telework) arrangements in light of the information being received in employee responses to the reintegration survey, including seeking acknowledgment from General Services Administration regarding rescission of the Department's pre-injunction cancellation of leases for office space, and reviewing actions for collective bargaining agreement compliance.
 - Confirmed timeline for regional office in New York to be available for occupancy in light of building remodeling underway, and inquired into capacity available in the regional office in Boston to evaluate space planning.
 - Discussed parameters for seeking program office senior management's input into reintegration strategies including IT access needs.
- Ensured that OCR continues to process, investigate, and resolve complaints including in a week that included two holiday days:
 - From March 11 to July 7, 2025, OCR received 5,164 complaints; opened 321 for investigation; opened 26 directed investigations; dismissed 3,625 complaints consistent with OCR's Case Processing Manual; resolved 99 complaints after investigation concluded insufficient evidence for findings; and resolved 308 complaints with voluntary agreements, OCR-mediated settlements, or technical assistance from OCR to ensure a recipient's digital resources are accessible to students with disabilities.
- The Department continued to pause to pause implementing significant interagency agreements and memoranda of understanding with agencies such as the Department of Labor and Treasury Department as referenced in my June 10, 2025 declaration, preventing the Department (and other agencies) from pursuing operational efficiencies and cost-savings.
- Additionally, the Department intends to take a position with respect to union grievances against the currently-enjoined March 11, 2025, RIF that the Department cannot substantively engage in the arbitration process initiated by the union.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC this 8th day of July.

A handwritten signature in cursive script, reading "Rachel Oglesby". The signature is written in dark ink and is positioned above a horizontal line.

Rachel Oglesby